



South Coast Air Quality Management District

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FAXED: APRIL 28, 2006

April 28, 2006

Lesley Likins
Riverside County Waste Management Department
Solid Waste Planning Management
14310 Frederick Street
Moreno Valley, CA 92553

Dear Lesley Likins:

**Mitigated Negative Declaration (MND) for Robert A. Nelson Transfer Station/
Materials Recovery Facility: EA No. 40362**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
RVC060404-12
Control Number

**Mitigated Negative Declaration (MND) for the Robert A. Nelson Transfer Station/
Materials Recovery Facility**

1. **On-Site Equipment Emissions I:** The lead agency states on pages 40 and 47 of the MND that existing equipment will operate more hours to handle the extra volume of solid waste that would be processed at the site. However, in estimating emissions from the extended use of existing equipment, Table A-3 only shows the additional 4-hour wheeled loader emissions. It is unclear why the lead agency excludes from the table emissions from the extra four hours per day that the forklift and the sweeper are used. Please explain this discrepancy or revise Table A-3 in the Final MND to account for emissions from all the on-site equipment as well as the extended daily use of the equipment.
2. **On-Site Equipment Emissions II:** Furthermore, the lead agency does not provide specific information on the type and number of equipment that are being used to process the bulk of the solid waste materials (excluding the green waste) brought to the site. On page 40 of the MND the lead agency describes in general terms the on-site equipment to also include wheeled loaders, a forklift and a sweeper. The MND also does not include any information on the emission factors, hours of operation, or other assumptions used to calculate emissions from on-site equipment. In the absence of the actual type and number of equipment being used to process the waste materials at the site, and the emission factors for the equipment in use, SCAQMD staff is unable to confirm the results shown in Table A-3.
3. **Reducing Diesel Emissions:** On page 44 of the MND the lead agency states that although the proposed project will result in increases in background traffic volume, the potential diesel particulate matter emissions can be minimized. The lead agency states that “adopted diesel emissions control programs” will reduce site emissions by 80 percent as truck volumes grow by up to 50 percent. The SCAQMD staff requests that the lead agency identify these control programs and quantitatively demonstrate that diesel particulate emissions can be reduced by 80 percent. SCAQMD staff recommends that the lead agency describe these programs along with their control efficiencies in the Final MND.
4. **Operational NO_x Emissions:** The lead agency states on page 47 of the MND that NO_x emissions from the additional 1,300 tons per day disposal capacity would substantially exceed the significance threshold. This statement appears to be inconsistent with the results shown in Table A-7. The lead agency also states, “future emissions improvements” would decrease ‘excess’ NO_x emissions to below threshold levels compared to existing conditions. The lead agency does not explain or describe what these future emissions improvements

are and how they would reduce the NO_x emissions. Please clarify whether or not NO_x emissions from the project are significant and, if so, specific mitigation measures must be identified and their control efficiencies applied to the total project NO_x emissions. If NO_x emissions continue to exceed the applicable NO_x significance threshold after application of all feasible mitigation measures, the proposed project no longer qualifies for a negative declaration.

5. **Reducing NO_x Operational Emissions:** If NO_x emissions exceed the applicable NO_x significance threshold as indicated on page 47, then the following measures are recommended for the lead agency to consider where applicable or feasible:

- For all equipment, such as yard tractors, loaders, wheelers and other service equipment, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, use low-sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.
- Require the use of aqueous or emulsified diesel fuel for all equipment. Aqueous diesel formulations have received interim verification by the California Air Resources Board and show a reduction of 16 percent in NO_x and 60 percent in diesel exhaust.
- Require the use of newer, lower-emitting trucks from companies and cities that will be dumping materials at the site.
- Require trucks to be properly tuned and maintained.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Require waste transfer management to train employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility.
- Require waste transfer station management to provide flyers and pamphlets for truck drivers informing them of the health effects of diesel particulate.